

Exhibit 1

to 4/2/25 letter of Attorney Dylan M. Schmeyer
(email exchange with counsel for Defendant, Amanda Palmer)

Pavlovich v. Neil Gaiman and Amanda Palmer
Case No. 25CV00078

Akiva Cohen

From: Mitchell Matorin <mmatorin@matorinlawoffice.com>
Sent: Tuesday, April 1, 2025 3:32 PM
To: Akiva Cohen; Kathryn Tewson; Dylan Schmeyer; Thomas Neville; wfick@fickmarx.com; dmarx@fickmarx.com
Subject: RE: Pavlovich v. Palmer

Hi Bill – Just following up on this, since I understand the WI court is asking for proof of service on your client there. Could you let us know your thoughts on Akiva's question?

Thanks, Mitch

Mitchell J. Matorin
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From: Akiva Cohen <acohen@kusklaw.com>
Sent: Friday, March 28, 2025 10:47 AM
To: Mitchell Matorin <mmatorin@matorinlawoffice.com>; Kathryn Tewson <ktewson@kusklaw.com>; Dylan Schmeyer <dschmeyer@kusklaw.com>; Thomas Neville <tneville@kusklaw.com>; wfick@fickmarx.com; dmarx@fickmarx.com
Subject: Re: Pavlovich v. Palmer

Bill,

Hope you don't mind my joining this thread – looking at the applicable rules, we're going to need to do a Rule 41(a)(1)(A)(i) dismissal of one of the two other actions against Amanda but have the other dismissal be a R. 41(a)(2) stipulated order (since a second 41(a)(1)(A)(i) dismissal would otherwise operate as an adjudication on the merits). Since Daniel is admitted in the S.D.N.Y., I assume you'd prefer to have us withdraw the Wisconsin matter under 41(a)(1) and do the stipulation to be so-ordered in NY. But I wanted to ask you before I did anything to effect the dismissals

Akiva

From: William Fick <wfick@fickmarx.com>
Sent: Friday, March 14, 2025 10:31:46 AM
To: Mitchell Matorin <mmatorin@matorinlawoffice.com>
Cc: Daniel Marx <dmarx@fickmarx.com>
Subject: RE: Pavlovich v. Palmer

Thanks Mitch.

We can confirm that Ms. Palmer intends to litigate in D Mass and we acknowledge that D Mass has personal jurisdiction. Ms. Palmer reserves her rights to assert any and all other defenses that may be available. We would hope and expect that she will be voluntarily dismissed from the WI and NY actions.

Meanwhile, we will go ahead and file an assented-to motion for extension of time to file a responsive pleading.

Have a nice weekend,

Bill

From: Mitchell Matorin <mmatorin@matorinlawoffice.com>
Sent: Thursday, March 13, 2025 6:15 PM
To: William Fick <wfick@fickmarx.com>
Cc: Daniel Marx <dmarx@fickmarx.com>
Subject: RE: Pavlovich v. Palmer

Bill, had to check with co-counsel. We agree to the extension, but we'd like an answer as to which district she intends to litigate in by the end of next week – can you agree to that?

Thanks, Mitch

Mitchell J. Matorin

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From: William Fick <wfick@fickmarx.com>
Sent: Thursday, March 13, 2025 4:27 PM
To: Mitchell Matorin <mmatorin@matorinlawoffice.com>
Cc: Daniel Marx <dmarx@fickmarx.com>
Subject: Pavlovich v. Palmer

Hi Mitch,

How have you been?

We finally meet in a case after all these years...

As you may have seen, we just appeared on behalf of Amanda Palmer.

We are getting oriented and would like to request a 30-day extension to file a responsive pleading, through and including 4/21. Can we have your assent?

Thanks,

Bill